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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11 (Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON DEBTORS'
MOTION PURSUANT TO 11 U.S.C. §§ 363(b)
AND 105(a) AND FED. R. BANKR. P. 6004 AND
9019 FOR ENTRY OF AN ORDER (I)
AUTHORIZING THE DEBTORS TO ENTER
INTO RESTRUCTURING SUPPORT
AGREEMENT WITH THE CONSENTING
SUBROGATION CLAIMHOLDERS, (II)
APPROVING THE TERMS OF SETTLEMENT
WITH SUCH CONSENTING SUBROGATION
CLAIMHOLDERS, INCLUDING THE
ALLOWED SUBROGATION CLAIM AMOUNT,
AND (III) GRANTING RELATED RELIEF**

**(THE "SUBROGATION SETTLEMENT AND
RSA MOTION")**

Date: October 23, 2019
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

**Objection Deadline:
October 16, 2019 at 4:00 p.m. (PT)**

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E
2 Corporation and Pacific Gas and Electric Company, as debtors and debtors in possession (the
3 “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), each filed a voluntary
4 petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”)
with the United States Bankruptcy Court for the Northern District of California (San Francisco
Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **October 23, 2019, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) in the courtroom of the
7 Honorable Dennis Montali, United States Bankruptcy Judge, Courtroom 17, 16th Floor, 450 Golden
Gate Avenue, San Francisco, California 94102.

8 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at
9 the Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Debtors’ Motion Pursuant to 11*
10 *U.S.C. §§ 363(b) and 105(a) and Fed. R. Bankr. P. 6004 and 9019 for Entry of an Order*
11 *(I) Authorizing the Debtors to Enter into Restructuring Support Agreement with the Consenting*
Subrogation Claimholders, (II) Approving the Terms of Settlement with Such Consenting Subrogation
Claimholders, Including the Allowed Subrogation Claim Amount, and (III) Granting Related Relief
filed by the Debtors on September 24, 2019 [Dkt. No. 3992] (the “**Motion**”).

12 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Motion must
13 be in writing, filed with the Bankruptcy Court, and served on the counsel for the Debtors at the
14 above-referenced addresses so as to be received by no later than **4:00 p.m. (Pacific Time) on**
15 **October 16, 2019**. Any oppositions or responses must be filed and served on all “Standard Parties”
16 as defined in, and in accordance with, the *Second Amended Order Implementing Certain Notice and*
17 *Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (the “**Case Management**
Order”). **Any relief requested in the Motion may be granted without a hearing if no opposition**
is timely filed and served in accordance with the Case Management Order. In deciding the
18 Motion, the Court may consider any other document filed in these Chapter 11 Cases and related
Adversary Proceedings.

19 **PLEASE TAKE FURTHER NOTICE** that copies of the Motion and its supporting papers
20 can be viewed and/or obtained: (i) by accessing the Court’s website at <http://www.canb.uscourts.gov>,
21 (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
22 94102, or (iii) from the Debtors’ notice and claims agent, Prime Clerk LLC , at
<https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based
parties; or +1 (929) 333-8977 for International parties or by e-mail at: pgeinfo@primeclerk.com.
Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

23 Dated: September 24, 2019

24 **WEIL, GOTSHAL & MANGES LLP**
25 **KELLER & BENVENUTTI LLP**

26 /s/ Thomas B. Rupp
27 Thomas B. Rupp

28 *Attorneys for Debtors and Debtors in Possession*